



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105

ETICAM Corporation
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Fernley, Nevada 89408

NVD980894338

Subj: Corrections Of Potential Violations At The ETICAM Facility

In order for ETICAM to continue to receive Superfund waste under the Off-Site Policy the following corrections/submittals must occur before September 5, 1991. If ETICAM is unable to complete training prior to the September 5, 1991 deadline due to class availability, EPA will be flexible on the scheduled date.

1) 40 CFR Part 262.34 (a) (2) and 262.34 (a) (3): ETICAM did not label a roll-off container of salt waste located outside near the Salt Pad with the words, "Hazardous Waste," or with the accumulation date (Photo No. 24).

If the roll-off is still on site it is to be correctly labeled and a photo taken and sent to EPA and NDEP to document correction.

Facility personnel are to take a refresher course in hazardous waste labeling and marking. Schedule for course and a description of the course content and a copy of the attendance roll are to be sent to EPA and NDEP.

2) 40 CFR Parts 262.34 (a) (1) and 265.173 (a): A container of waste "Sample and Sink Wash Out" labeled "Acid Waste Only" located in the laboratory was left open while in storage. (Photo No. 2) Also, a roll-off container of waste salt (F006) was left open while in storage (Photo No. 24). (containers were closed by the facility during the inspection).

Facility personnel are to take a refresher course in hazardous waste handling and storage requirements. A description of the course content and a copy of the attendance sheet are to be sent to EPA and NDEP.

3) 40 CFR Part 264.15(a): ETICAM does not inspect the Truck Receiving Bay for the condition of the containers of sludge waste which may lead to a release of hazardous waste (Photo No. 11).

ETICAM is to establish an inspection log and an inspection schedule for the Truck Receiving Bay. Copies of the established schedule and records of the first two inspections are to be sent to EPA and NDEP.

4) 40 CFR 264.35: ETICAM does not maintain aisle space between containers of sludge metallic waste in the Truck Receiving Bay (Photo No. 11).

Permanent aisle space to be established by painting/markings of aisle. Training to be given to facility personnel on the importance of aisle space. Attendance roll of personnel trained and photo of corrected aisle space are to be sent to EPA and NDEP.

5) 40 CFR Part 264.173(b) and Permit Part III.E.: Containers in the Truck Receiving Bay were leaning precariously indicating that they were not being stored in a manner to prevent them from rupturing (Photo No. 11).

Facility personnel will receive additional training in hazardous waste handling and storage of containers in the Truck Receiving Bay. Attendance roll and course content are to be sent to EPA and NDEP.

6) 40 CFR Part 265.15 (b) (1) and 265.15 (d): ETICAM does not record in the inspections log the facts that: 1) There was a hole in the circular hazardous waste tank at the Crystallization Pad; and 2) The waste salt by-product roll-off container was not labeled with the words, "Hazardous Waste," and/or the accumulation date (Photo Nos. 23 and 24).

ETICAM is to establish a hazardous waste inspection log that addresses all facility malfunctions/damage, date of inspection, how the malfunction was corrected and the date of correction. Facility personnel are to receive training in inspection of hazardous waste storage and handling. Attendance roll and course content are to be sent to EPA and NDEP.

7) 40 CFR Part 265.195 (a) (2) and 265.195 (a) (4): ETICAM did not inspect the aboveground portions of the construction material of the circular tank located in the salt crystallization area to detect the release of hazardous waste (attachment 5 C and Photo No. 23).

Facility personnel responsible for inspections are to take a class specifically related to tanks and tank inspection. Attendance roll and course content are to be sent to EPA and NDEP.

8) 40 CFR Parts 265.196 (b): ETICAM did not remove from service a circular hazardous waste tank in the salt crystallization area that had a hole on the bottom and was observed leaking (Photo No. 23). In addition ETICAM did not remove the waste from the tank to prevent further releases.

Tank in the salt crystallization area is to be repaired, waste contents removed or tank removed from service. Photo of repair or removal of waste contents to be sent to EPA and NDEP. If the tank is removed from service ETICAM would need to go through closure and submit closure plan to EPA and NDEP. Facility personnel to receive training in the importance of preventing releases to the environment. Attendance roll and course content are to be sent to EPA and NDEP.

9) 40 CFR Part 268.7 (a): ETICAM as a generator of the waste salt by-product, does not test this waste or extract, using the TCLP.

Facility is to obtain waste analyses from a certified lab showing that after ETICAM has treated the salt by-product that waste meets all disposal standards. Copy of the analyses to be sent to EPA and NDEP. The original analyses to remain on site.

10) 40 CFR Part 268.7 (b) (1): ETICAM as a treatment facility, does not test the treatment residues of waste with treatment standards expressed as concentrations in the waste extract (Part 268.41) using the TCLP. These wastes include F006, K061, and K062.

ETICAM will test treatment residues to see that waste meets all treatment standards. The facility will revise their Waste Analysis Plan to comply with 268.41. In the interim these waste streams (F006, K061, and K062) will be tested at least once by a certified lab and the results of the analyses are to be sent to EPA and NDEP.

11) Consent For The Issuance Of A Decree, Case No. 91-00112A: ETICAM does not measure each bulk bag or box and mark each with the equivalent yardage.

ETICAM will establish a log showing entries of each bulk bag/box and its equivalent yardage. This log is to be signed each day by the facility manager. The first month of log entries (on a weekly basis) are to be sent to EPA and NDEP.